


Policy		
Title: Combating trafficking in persons compliance plan		
Number: POL 665	Rev. R00	
CN: DMS-110		

1. Purpose and scope.

This document describes the program requirements and processes established and implemented by i+solutions (hereafter referred to as 'the Company' or 'i+solutions') to comply with US Government Federal Acquisition Regulation FAR 52.222-50, Combating Trafficking in Persons. The scope of the plan includes the operations and activities of the Company, as well as the subcontractors and agents in its supply chain activities on projects.

2. Introduction.

i+solutions is opposed to all forms of human trafficking and forced labor.

We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business.

i+solutions follows and adheres to the US Government zero-tolerance policy regarding any Government employees and contractor/recipient personnel and their agents engaging in any form of trafficking in persons ("TIP"), defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery and sex trafficking.

This plan sets out how i+solutions complies with the Federal Acquisition Clauses regarding Human Trafficking (FAR 52.222-50 and 52.222-56), similar requirements from Federal assistance awards and international standards.

i+solutions has several policies in place to support this plan.


These are:

- i+solutions Code of Conduct
- The Whistle-blower & Harassment Policy and the Whistle-blower investigations guidelines


i+solutions Personnel are required to comply with the provisions contained in the Federal Acquisition Regulation: Ending Trafficking in Persons (48 CFR Parts 1, 2, 9, 12, 22, 42, and 52) (the "FARs"), Executive Order 13627, "Strengthening Protections Against Trafficking in Persons in Federal Contracts," (the "Executive Order"), USAID Mandatory Standard Provisions "Combating Trafficking in Persons ("Mandatory Provision") as well as the present i+solutions' Trafficking in persons compliance plan, the i+solutions Code of Conduct and the Whistle-blower & Harassment Policy.

Additional awareness information about trafficking in persons may be found at the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons website at <http://www.state.gov/j/tip>

3. Terms and definitions

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Term	Meaning
Commercial Sex Act	any sex act on account of which anything of value is given or received.
Business Partner	any contractor, subcontractor, grantee, sub-grantee, awardee, sub-awardee, law firm, vendor, supplier, landlord, or other individual or organization providing goods or services to i+solutions.
Employee	any person who has a part-time, full-time, intermittent, continuous, or fixed-term employment relationship with i+solutions.
Representative	Employee or any person who has an independent individual contractual relationship with i+solutions, whether as a contractor, consultant, or hire of i+solutions.
For the performance under this project	all actions directly, indirectly and identifiably funded by the project's funds during the performance of the project.
Closely Associated with the performance under the project	any actions which are directly associated with the performance of the project but may not be identifiably funded by the project funds, including but not limited to domestic workers employed by i+solutions representatives in-country, i+solutions representatives' activities while in country or while employed under the project.
Trafficking	the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
Forms of Human Trafficking	Forced Labor, Sex Trafficking, Debt Bondage, Child Sex Trafficking.
Severe Forms of Trafficking	(a) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age; or (b) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
Sex trafficking	the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.
Involuntary servitude	includes a condition of servitude induced by means of (a) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer

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	serious harm or physical restraint; or (b) the abuse or threatened abuse of the legal process.
Debt bondage	the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.
Coercion	(a) threats of serious harm to or physical restraint against any person; (b) any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or, (c) the abuse or threatened abuse of the legal process.

4. References:

- <https://www.acquisition.gov/far/52.222-50>
- <http://www.state.gov/j/tip>


5. Policy

Compliance by i+solutions Employees, Representatives and Business Partners

i+solutions does not tolerate or condone trafficking in person of any kind, regardless of the jurisdiction in which i+solutions is registered or doing business. Employees, Representatives and Business Partners are required to prohibit transactions with, and the provision of resources and support to, individuals and organizations associated with trafficking.

i+solutions employees, representatives and partners are prohibited from:

- Engaging in any forms of trafficking in persons
- Procuring commercial sex acts (*in countries it is not legalized*)
- Using trafficked labor at any level in the performance of a contract or closely associated with the performance of the contract
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work

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- Using recruiters that do not comply with the local labor laws of the country in which the recruiting takes place
- Charging employees recruitment fees
- Providing or arranging housing that fails to meet the host country housing and safety standards
- Sub-letting, renting out or allowing any project funded resources to be used for any purpose outside the performance of the project
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee prior to the employee relocating
- Hiring domestic workers without providing a reasonable market wage directly to them (and not third party) as payment

6. Remedy for Non-Compliance


Any violation of the FARs, the Executive Order, Mandatory Provision or i+solutions Trafficking in persons compliance plan could result in disciplinary action which may include but is not limited to, an employee’s removal from a project, reduction in benefits, termination of employment and legal pursue.

For subcontractors and subcontractor employees, failure to comply with the requirements of the applicable regulations is grounds for i+solutions to take any and all appropriate actions, up to and including immediate termination for material breach (default) of that subcontractor’s contract with i+solutions.

7. Ensuring Compliance: Awareness, Training, Monitoring & Prevention

7.1 Training, Monitoring & Prevention


- i+solutions has developed and implemented an awareness program to inform all employees about the FAR’s prohibitions against trafficking-related activities described in FAR 52.222-50(b), the activities prohibited, and the actions that will be taken against the employee for violations. Those employees are trained on:
 - the i+solutions up to date Human Trafficking Policy, Whistleblower Policy and Code of Conduct;
 - consequences for violating i+solutions policies;
 - the violation reporting process.
- Representatives are trained both prior departure from their home countries and again upon arrival in the country where the work will be performed. They are also provided with written materials that include all subjects covered in the training.

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- i+solutions shall train its professionals staff that visit i+solutions subcontractors and supplier premises on recognizing signs of human trafficking and the appropriate action to take if human trafficking is suspected.
- Representatives and Business Partners are required, in their respective contracts, to sign a statement confirming they are aware, have understood, and agree to abide by the respective Code of Conduct.
- A verbal explanation of the contents is given upon request to individuals unable to read the printed information.
- i+solutions shall post its compliance plan no later than the initiation of a project, at the workplace (unless the work is to be performed in the field or not in a fixed location) and on i+solutions' website.
- All agents and subcontractors, as a part of the set-up process of a project will receive the "Human Trafficking and forced labor policy", a return sign copy will be required as acknowledgement of the "Human Trafficking and forced labor policy".
- i+solutions' includes appropriate Anti-Trafficking Clauses in all subcontracts.
- i+solutions requires its subcontractors and agents whose subcontracts are covered by 52.222-50(i)(1) (A) and (B) to certify prior to subcontract award and annually thereafter that they have implemented compliance plans that comply with 52.222-50(h) and that, after having conducted due diligence, either (1) To the best of the subcontractor's knowledge and belief, neither it nor any of its agents, subcontractors, or their agents, has engaged in any such activities; or (2) If abuses relating to any of the prohibited activities identified in 52.222-50(b) have been found, the subcontractor has taken the appropriate remedial and referral actions.
- All subcontractors of i+solutions are required by contract to fully cooperate with i+solutions staff, contracting agencies and other Federal agencies to conduct audits and investigations on compliance with the provisions of FAR 52.222-50(b), Combating Trafficking in Persons.
- Failure to comply with the requirements of the FAR 52.222-50 is grounds for i+solutions to take any and all appropriate actions, up to and including immediate termination of that supplier's contract with i+solutions.

7.2 Recruitment & Wage Plan

- Accurate information will be given to all employees regarding the assignment they are being offered.
- Any violations of FAR requirements could result in i+solutions terminating the contract of a subcontractor or supplier. Additionally, i+solutions will report all identified violations of FAR 52.222-50 (b) and remedial action(s) taken, as well any credible information it receives from any source that alleges conduct in violation of FAR 52.222-50 (b) to i+solutions Head Quarter.
- All subcontractors to i+solutions provide all employees with an employment contract/employment agreement in writing, containing a detailed description of the terms and conditions of their employment, where such contract is required by law or contract.

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- Contracts are written in a language that the employee understands and are provided to them for review and signature prior to departure from their country of origin.
- Employment contracts contain the following (or similar):
 - Detailed description of the work (SOW or JD)
 - Wages (compliant with host country legal requirements)
 - Prohibition on charging recruitment fees to the employee
 - Work location(s)
 - Living accommodations and associated costs, if offered
 - Time off when applicable
 - Grievance process
 - Content of applicable laws and regulations that prohibit trafficking in persons
 - Employee’s full name
 - Employee’s date of birth
 - Employee’s passport number and work visa/permit number when required
 - Employee contact information
 - Work start date and duration of contract
 - Procedure for early contract termination without penalty, including notice period (per applicable law)
 - Contract renewal provisions
 - Regular work hours and shifts
 - Estimated gross wage or monthly agreed fees
 - Method and frequency of wage payment
 - Bonuses and conditions for earning them(when applicable)
 - Allowances(when applicable)
 - Full listing of any and all deductions, including specification of the type and amount of each deduction and which, if any, are optional (for example, meals, transportation, communications, or other services provided or offered).
 - Description of additional benefits including medical insurance coverage, accident/injury insurance, holidays, annual leave, sick leave, and/or any other applicable benefits.
 - Any other terms required by applicable laws and regulations
 - No terms restricting an employee’s rights to freedom of association and collective bargaining consistent with local law
 - The contracts used by its suppliers and subcontractors are reviewed by i+solutions headquarter.
- i+solutions has robust recruitment practices that minimize the risk of engaging Representatives who have been convicted of Trafficking.
- If the employee must relocate to perform the work, i+solutions must provide the required work document prior to relocation.
- To the extent that i+solutions uses recruitment companies, only recruitment companies with trained employees may be used, no recruitment fees may be charged to the employee and all wages must meet applicable host-country legal requirements or explain any variance.

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- i+solutions pays wages that meet applicable host-country legal requirements to all Employees and explain any such variance.
- Domestic workers of i+solutions representatives are paid a prevailing wage under a written contract (where practical) in the language that they understand.
- i+solutions discourages payment of wages in cash in countries with effective banking systems, and instead encourages direct deposit of wages to a bank account in the sole name of the domestic worker or payment by check. These measures provide objective evidence in the event of a salary dispute.
- If a licensed agency is used to employ domestic workers, proof of payment of a reasonable market wage to the employee must be made available to i+solutions.

7.3 Awareness Indicators

- As part of i+solutions onboarding representatives, employees, suppliers, shall be made aware of the following indicators of trafficking in persons, learn to recognize them and report them as outlined in this plan.

People who have been trafficked may:

- Believe that they must work against their will;
- Be unable to leave their work environment;
- Show signs that their movements are being controlled;
- Feel that they cannot leave;
- Show fear or anxiety;
- Be subjected to violence or threats of violence against themselves or against their family members and loved ones;
- Suffer injuries that appear to be the result of an assault;
- Suffer injuries or impairments typical of certain jobs or control measures;
- Suffer injuries that appear to be the result of the application of control measures;
- Be distrustful of the authorities;
- Be threatened with being handed over to the authorities;
- Be afraid of revealing their immigration status;
- Not be in possession of their passports or other travel or identity documents, as those documents are being held by someone else;
- Have false identity or travel documents;
- Be found in or connected to a type of location likely to be used for exploiting people;
- Be unfamiliar with the local language;
- Not know their home or work address;
- Allow others to speak for them when addressed directly;
- Act as if they were instructed by someone else;
- Be forced to work under certain conditions;

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- Be disciplined through punishment;
- Be unable to negotiate working conditions;
- Receive little or no payment;
- Have no access to their earnings;
- Work excessively long hours over long periods;
- Not have any days off;
- Live in poor or substandard accommodation;
- Have no access to medical care;
- Have limited or no social interaction;
- Have limited contact with their families or with people outside of their immediate environment;
- Be unable to communicate freely with others;
- Be under the perception that they are bonded by debt;
- Be in a situation of dependence;
- Come from a place known to be a source of human trafficking;
- Have had the fees for their transport to the country of destination paid for by facilitators, whom they must pay back by working or providing services in the destination;
- Have acted on the basis of false promises.

Children who have been trafficked may:


- Have no access to their parents or guardians;
- Look intimidated and behave in a way that does not correspond with behaviour typical of children their age;
- Have no friends of their own age outside of work;
- Have no access to education;
- Have no time for playing;
- Live apart from other children and in substandard accommodations;
- Eat apart from other members of the “family”;
- Be given only leftovers to eat;
- Be engaged in work that is not suitable for children;
- Travel unaccompanied by adults;
- Travel in groups with persons who are not relatives.

The following might also indicate that children have been trafficked:

- The presence of child-sized clothing typically worn for doing manual or sex work;
- The presence of toys, beds and children’s clothing in inappropriate places such as brothels and factories;
- The claim made by an adult that he or she has “found” an unaccompanied child;
- The finding of unaccompanied children carrying telephone numbers for calling taxis;
- The discovery of cases involving illegal adoption.

People who have been trafficked for the purpose of domestic servitude may:

- Live with a family;
- Not eat with the rest of the family;
- Have no private space;
- Sleep in a shared or inappropriate space;

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- Be reported missing by their employer even though they are still living in their employer’s house;
- Never or rarely leave the house for social reasons;
- Never leave the house without their employer;
- Be given only leftovers to eat;
- Be subjected to insults, abuse, threats or violence.

People who have been trafficked for the purpose of sexual exploitation may:

- Be of any age, although the age may vary according to the location and the market;
- Move from one brothel to the next or work in various locations;
- Be escorted whenever they go to and return from work and other outside activities;
- Have tattoos or other marks indicating “ownership” by their exploiters;
- Work long hours or have few if any days off;
- Sleep where they work;
- Live or travel in a group, sometimes with other women who do not speak the same language;
- Have very few items of clothing;
- Have clothes that are mostly the kind typically worn for doing sex work;
- Only know how to say sex-related words in the local language or in the language of the client group;
- Have no cash of their own;
- Be unable to show an identity document.
- There is evidence that suspected victims have had unprotected and/or violent sex;
- There is evidence that suspected victims cannot refuse unprotected and/or violent sex;
- There is evidence that a person has been bought and sold;
- There is evidence that groups of women are under the control of others;
- Advertisements are placed for brothels or similar places offering the services of women of a particular ethnicity or nationality;
- It is reported that sex workers provide services to a clientele of a particular ethnicity or nationality;
- It is reported by clients that sex workers do not smile.

People who have been trafficked for the purpose of labor exploitation are typically made to work in sectors such as the following: agriculture, construction, entertainment, service industry and manufacturing (in sweatshops). People who have been trafficked for labor exploitation may:

- Live in groups in the same place where they work and leave those premises infrequently, if at all;
- Live in degraded, unsuitable places, such as in agricultural or industrial buildings;
- Not be dressed adequately for the work they do: for example, they may lack protective equipment or warm clothing;
- Be given only leftovers to eat;
- Have no access to their earnings;
- Have no labor contract;
- Work excessively long hours;
- Depend on their employer for a number of services, including work, transportation and accommodation;

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- Have no choice of accommodation;
- Never leave the work premises without their employer;
- Be unable to move freely;
- Be subject to security measures designed to keep them on the work premises;
- Be disciplined through fines;
- Be subjected to insults, abuse, threats or violence;
- Lack basic training and professional licenses.

The following might also indicate that people have been trafficked for labor exploitation:

- Notices have been posted in languages other than the local language;
- There are no health and safety notices;
- The employer or manager is unable to show the documents required for employing workers from other countries;
- The employer or manager is unable to show records of wages paid to workers;
- The health and safety equipment is of poor quality or is missing;
- Equipment is designed or has been modified so that it can be operated by children;
- There is evidence that labor laws are being breached;
- There is evidence that workers must pay for tools, food or accommodation or that those costs are being deducted from their wages.


Indicators are not proof of trafficking in persons; they are the starting point for investigation.

7.4 Reporting Process

Human Trafficking and forced labor reporting flow

- The complainant may request confidentiality when reporting the suspected misconduct. In general the complainant may either report the misconduct internally through HR/manager. In some cases, the person witnessing or suspecting the abuse(s) may skip internal reporting and go straight to external reporting (for ex, if the highest management of the organization is involved in the suspected misconduct).
- Representatives and Business Partners are required to report violations of i+solutions Policies, Guidelines, Business Processes and Standard Operating Procedures, including those related to human Trafficking. The Code of Conduct states that violations must be reported to management or through i+solutions' Whistle-blower mechanism, the Works Council, the Human Resources department or to Marlout Corba (+31 6 53927978 /m.corba@jccconsulting.nl) confidential advisor/vertrouwenspersoon, independent of the organization. In addition, Representatives have available means to report non-compliance by calling the Global Human Trafficking Hotline at 1-884-888 FREE and by emailing to help@befree.org.

7.5 Incident Management


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- Review of a misconduct Investigations of Misconduct may be initiated under a number of circumstances. The Work Council, HR/Manager and or confidential advisor receives notification of Misconduct. Suspicious situations may arise during normal business operations, Whistle-blower allegations may be reported internally or through the Whistle-blower policy or notice may be received from outside entities, such as Client investigators or law enforcement.
- It is important to maintain confidentiality to the extent possible in order to protect individuals and not allow for any contamination of evidence. What is reported and appears may only be part of a larger issue. Suspects should not be confronted.
- Work Council, HR/Manager and or confidential advisor notifies the CEO and concurrently notifies the WPO (Whistleblower Protection Officer).
- Work Council, HR/Manager and or confidential advisor notifies the CEO of all material Misconduct reviews.
- All relevant stakeholders hold meetings to discuss the issue raised. The Crisis Management Team (CMT)/WPO coordinates with the appropriate Regional Partners; Directors, Project Operations, Senior Managers/Manager, Project Operations and other appropriate managers to ensure proper resources and expertise are available to assist in the determination of facts and who shall take the following actions.
- The Project Director determines if the Client regulations/head contract requires a report. The Project Director coordinates the response with guidance from the CMT, HR and required outside parties as needed. CMT and relevant parties will prepare a report of the investigation.

7.6 Internal review

Where an employee, partner, supplier, contractor of i+solutions believes in good faith on reasonable grounds that any other employee, supplier or (sub) or contractor has breached general law, organizational policy, or generally recognized principles of ethics, and wishes to report their concern, that employee must report their concern to:

- Their manager: or, if they feel that their supervisor may be complicit in the breach,
- The CEO: or, if they feel that the CEO may be complicit in the breach,
- The Works Council, HR or CMT
- Organisation's nominated WPO, or
- Marlout Corba (+31 6 53927978/m.corba@jccconsulting.nl) confidential advisor/Vertrouwenspersoon, or
- External and Confidential Legal Advisor: Maartje Sträter (+31 6 46633233 / mailto:strater@straterlegal.nl)
- The Dutch whistle-blowers Authority (advies@huisvoorklokkenluiders.nl), or
- The duly constituted legal authorities responsible for the enforcement of the law in the relevant area.

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7.7 External review

- Where circumstances warrant based on complexity or any legal concerns, an outside investigator or other external resources, including legal counsel, should be engaged to ensure a thorough investigation of the allegation.
- CMT, WPO will decide whether that is required, and if so, will engage relevant external party and monitor progress.
- Subject to the approval of the Client (where applicable) and if the investigation is considered material, a framework and plan for the investigation are developed by the CMT, WPO with input from the external resource. Any investigation involving missing money or stolen assets normally will require a police report.
- The investigator completes the plan and work steps as prepared above. CMT, WPO is kept informed of the results. Additional work steps may be considered based on the results. The investigator prepares a summary report at the conclusion of the work in an email to the CMT and WPO.
- Project Directors are responsible for notifying the Client, and other interested parties, under the guidance of the CMT, WPO.
- Further, under the guidance of the CMT, WPO they consult the Client, Regional Business Partner and other stakeholders about the investigation and keep them informed of its progress as appropriate.

7.8 Violation of law and recovery

Where it is determined there is sufficient evidence to conclude a violation of law has occurred, i+solutions will determine with the guidance of the CMT, WPO and any other relevant parties the action plan towards a resolution and recovery plan once necessary measures have been towards determined the law violations.

7.9 Follow up

- The Head of the CMT and WPO, ensure that recommendations are implemented as agreed. WPO and CMT documents the response and the closing of the case.
- As described above, employees may, in good faith, report, without fear of retaliation and with employee protection under the [Dutch Whistleblower Act](#) any activity that violates the FARs, the Mandatory Provision, the Executive Order or i+solutions Anti-Trafficking Policy report to their management, the HR Department, Marlout Corba (+31653927978/m.corba@jccconsulting.nl) confidential advisor , or External and Confidential Legal Advisor: Maartje Sträter (+31646633233/<mailto:strater@straterlegal.nl>)
- Anyone else, including subcontractors, agents, consultants, may also use the hotlines or websites to report any issues relating to human trafficking.